SOUTHERN DISTRICT OF NEW YORK	-	
UNITED STATES OF AMERICA v. ROBERT HADDEN Defendant.	X : : : :	Case No.: 20 Cr. 468 (RMB) NOTICE OF MOTION
	X	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the annexed Declarations of WAYNE E. GOSNELL, JR. and ROBERT HADDEN and attached and accompanying Exhibits, defendant Robert Hadden will move this Court, before the Honorable Richard M. Berman, U.S.D.J. at the United States Courthouse located at 500 Pearl Street, New York, New York, on January 9, 2021 to Reconsider the Court's December 23, 2020 Decision & Order and granting the following relief: (1) an Order clarifying that Clayman & Rosenberg LLP's representation of Mr. Hadden in this matter has been terminated and excusing Clayman & Rosenberg LLP from further appearances; and (2) an Order granting Mr. Hadden's application for court-appointed counsel.

Dated: New York, NY January 4, 2021

Respectfully submitted,

By: _____

Wayne E. Gosnell, Jr.
Isabelle A. Kirshner
CLAYMAN & ROSENBERG LLP
305 Madison Avenue, Suite 650
New York, New York 10165
Counsel for Robert Hadden

By ECF to:

Jessica Lonergan Maurene Comey Lara Pomerantz Assistant United States Attorneys United States Attorney's Office Southern District of New York One St. Andrews Plaza New York, NY 10007

Counsel for United States of America